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# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199731
Party	Defendant Comodo Group, Inc., Comodo CA Limited
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Submission	Answer
Filer's Name	Stephen Cannavale
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Date	06/20/2011
Attachments	AnswerVeriSign.pdf ( 3 pages )(48115 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE TRADEMARK TRIAL AND APPEAL BOARD

VeriSign, Inc.	
Opposer,	
Vs.	
	Opposition No. 91199731
Comodo Group, Inc.	
Comodo CA Ltd.	
Applicant	

UNITED STATES PATENT AND TRADEMARK OFFICE Trademark Trial and Appeal Board P.O. Box 1451 Alexandria, Virginia 22313-1451

#### ANSWER

Comes now Applicant Comodo Group Inc. and Comodo CA Ltd ("Applicant") by Counsel Stephen Cannavale, Corporate Counsel and answers the Notice of Opposition filed by VeriSign, Inc. as follows:

## **OPPOSER'S MARKS**

- 1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 and, accordingly denies such allegations.
- 2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 and all it's subparts a-e, and, accordingly denies such allegations.
- 3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 and, accordingly denies such allegations.

### APPLICANT'S MARKS

4. Admitted.

5. Applicant admits that its application was filed on June 4, 2010 in International Class 042 and assigned Serial No. 85/055,223 and published for opposition on November 9, 2010 and is currently pending on a Section 1(b) basis.

6. Admitted.

### LIKELIHOOD OF CONFUSION

7. Applicant denies the allegation in Paragraph 7.

8. Applicant denies the allegation in Paragraph 7.

9. Applicant admits that it is not affiliated with Verisign and denies Paragraph 9 in all other respects.

10. Applicant denies the allegation in Paragraph 10.

11. Applicant denies the allegation in Paragraph 11.

12. Applicant denies the allegation in Paragraph 12.

13. Applicant denies the allegation in Paragraph 13.

14. Applicant denies the allegation in Paragraph 14.

Applicant denies each and every allegation of the Opposition not specifically admitted herein.

WHEREFORE, Applicant respectfully requests that the Opposition be denied and the Application be granted.

Dated this day of June 2011.

Comodo Group Inc. Comodo CA Ltd.

Stephen Cannavale, Esq.

Corporate Counsel, Comodo

## **CERTIFICATE OF SERVICE**

I, Stephen Cannavale, hereby certify that I caused a copy of the foregoing ANSWER to be served upon Suzanne V. Wilson, Esq., Arnold an Porter LLP, 777 South Fiqueroa Street, 44<sup>th</sup> Floor, Los Angeles, CA 90017-5844 by email on June 20, 2011 and by follow-up confirmation regular mail on June 21, via First Class mail, postage prepaid to the address below.

Suzanne V. Wilson, Esq. Arnold an Porter LLP 777 South Fiqueroa Street 44<sup>th</sup> Floor Los Angeles, CA 90017-5844

Stephen Cannavale, Esq.